

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE,
AT KNOXVILLE

AMELIA DAVIS LESTER)	
)	
Plaintiff,)	CIVIL ACTION
)	
vs.)	NO.
)	
ALLSTATE PROPERTY AND)	JURY DEMAND
CASUALTY INSURANCE)	
COMPANY,)	
)	
Defendant)	

NOTICE OF REMOVAL

Comes now the defendant, Allstate Property and Casualty Insurance Company, and petitions this Court for removal of an action heretofore filed in the Circuit Court for Claiborne County, Tennessee, and for grounds would show the Court as follows:

I.

The above named plaintiff has filed a Complaint and Summons in the Circuit Court for Claiborne County, Tennessee, under Civil Action No. 12-CV-815 said action being filed on the 31st day of May, 2012, and being served upon the defendant Allstate Insurance Company on June 4, 2012.

II.

The above lawsuit is a breach of contract action wherein the plaintiff seeks recovery from the defendant of the proceeds of an insurance policy allegedly insuring a house and contents at 1993 Snodgrass Road, New Tazewell, Tennessee 37825, which were damaged by a fire on March 11, 2012. The Complaint demands judgment against the defendant for an amount in excess of \$75,000.00. A copy of the Summons and Complaint are attached hereto as Exhibit "A".

III.

This Notice of Removal is filed within the statutory period required by 28 USC §1446. There is a complete diversity between the plaintiff and defendant and the amount in controversy exceeds the sum of Seventy Five Thousand (\$75,000.00) Dollars, exclusive of interest and cost.

IV.

The plaintiff is a citizen and resident of Claiborne County, Tennessee. Defendant, Allstate Property and Casualty Insurance Company, is a corporation organized and existing under the laws of the State of Illinois with its principal place of business in Northbrook, Illinois. It is not incorporated in Tennessee and does not have its principal place of business in Tennessee. There is complete diversity of citizenship between the parties as required by 28 USC §1332. The amount in controversy exceeds Seventy Five Thousand (\$75,000.00) Dollars exclusive of interest and costs and is, therefore, within the statutory jurisdiction set forth at 28 USC §1332.


V.

WHEREFORE, the defendant, Allstate Property and Casualty Insurance Company, respectfully requests the Court to accept removal of this cause from the Circuit Court for Claiborne County, Tennessee, and to proceed with this action in accordance with the law.

Respectfully submitted,

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By:


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